

1 Ramon Rossi Lopez (admitted *pro hac vice*)  
(CA Bar No. 86361)  
2 LOPEZ McHUGH LLP  
100 Bayview Circle, Suite 5600  
3 Newport Beach, California 92660  
rlopez@lopezmchugh.com

4 Mark S. O'Connor (011029)  
5 Paul Stoller (016773)  
GALLAGHER & KENNEDY, P.A.  
6 2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
7 Telephone: (602) 530-8000  
mark.oconnor@gknet.com  
8 *Attorneys for Plaintiffs*

9 James R. Condo (#005867)  
Amanda C. Sheridan (#027360)  
10 SNELL & WILMER L.L.P.  
One Arizona Center  
11 400 E. Van Buren, Suite 1900  
Phoenix, Arizona 85004-2202  
12 Telephone: 602.382.6000  
Facsimile: 602.382.6070  
13 jcondo@swlaw.com  
asheridan@swlaw.com

14 Richard B. North, Jr. (admitted *pro hac vice*)  
Georgia Bar No. 545599  
15 Matthew B. Lerner (admitted *pro hac vice*)  
Georgia Bar No. 446986  
16 NELSON MULLINS RILEY & SCARBOROUGH LLP  
201 17th Street, NW / Suite 1700  
17 Atlanta, GA 30363  
Telephone: (404) 322-6000  
18 richard.north@nelsonmullins.com  
matthew.lerner@nelsonmullins.com

19 *Attorneys for Defendants C. R. Bard, Inc. and*  
20 *Bard Peripheral Vascular, Inc.*

21  
22 IN THE UNITED STATES DISTRICT COURT  
23 FOR THE DISTRICT OF ARIZONA

24 IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**JOINT SUBMISSION ON MEET  
AND CONFER AND BRIEFING  
SCHEDULE REGARDING  
DEFENDANTS' MOTION TO SEAL**

27 After the status conference on May 3, 2017, the Court instructed the parties to  
28 propose a meet and confer and briefing schedule on Defendants' Motion to Seal

Confidential Exhibits filed with its Motion for Summary Judgment on Preemption (Dkt. 5770). On May 12, 2017, the parties submitted a proposed schedule (Dkt. 5872). Since that time, the parties have been diligently reviewing and conferring on the confidential documents filed by Defendants with its Motion for Summary Judgment, and have made and continue to make progress in addressing the documents and reaching agreements on many of them. However, because of the volume of the documents and some issues created by an erroneous production by FOIA Services of certain Bard documents, the parties need additional time to complete the process. The parties believe that they will be able to reach an agreement on the confidentiality (or confidential portions) of most of the exhibits.

Given the foregoing, the parties propose the following revised briefing schedule for the Motion to Seal:

**July 28** Deadline for Defendants to file an amended Motion to Seal reflecting the exhibits that Defendants seek to seal and which Plaintiffs do not oppose and the remaining exhibits that Defendants seek to seal that Plaintiffs do oppose.

**August 28** Deadline for Plaintiffs to respond to amended Motion to Seal.

**September 13** Deadline for Defendant to file any reply brief supporting the Amended Motion to Seal

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1 The parties note that under this schedule, the briefing on the Motion to Seal is  
2 completed before the briefing on the Motion for Summary Judgment under either of the  
3 proposals for that briefing schedule.

4 RESPECTFULLY SUBMITTED: June 30, 2017.

5 GALLAGHER & KENNEDY, P.A.

NELSON MULLINS RILEY &  
SCARBOROUGH, LLP

6 By: s/ Mark S. O'Connor

7 Mark S. O'Connor (011029)  
8 Paul L. Stoller (016773)  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225

9 Ramon Rossi Lopez  
10 (admitted *pro hac vice*)  
CA Bar No. 86361  
11 LOPEZ McHUGH LLP  
100 Bayview Circle, Suite 5600  
12 Newport Beach, California 92660  
Attorneys for Plaintiffs

By: /s/ Richard B. North, Jr.

Richard B. North, Jr. (admitted *pro hac*  
*vice*)  
Georgia Bar No. 545599  
Matthew B. Lerner (admitted *pro hac*  
*vice*)  
Georgia Bar No. 446986  
Nelson Mullins Riley & Scarborough  
LLP  
201 17th Street, NW / Suite 1700  
Atlanta, GA 30363

James R. Condo (027360)  
Amanda C. Sheridan (005867)  
SNELL WILMER L.L.P.  
One Arizona Center  
400 E. Van Buren, Suite 1900  
Phoenix, Arizona 85004-2202  
Attorneys for C. R. Bard, Inc. and Bard  
Peripheral Vascular, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 30, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

s/Richard B. North, Jr.  
Richard B. North, Jr.  
Georgia Bar No. 545599  
NELSON MULLINS RILEY & SCARBOROUGH, LLP  
Atlantic Station  
201 17th Street, NW / Suite 1700  
Atlanta, GA 30363  
PH: (404) 322-6000  
FX: (404) 322-6050  
Richard.North@nelsonmullins.com

**Attorney for Defendants C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.**